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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

STEFFON BARBER, an individual,
Plaintiff,
vs.
COUNTY OF SAN BERNARDINO
and CHRISTOPHER ALFRED,
Defendants.

Case No. 5:22-cv-00625-KK-DTB
Assigned to:
District Judge Kenly Kiya Kato
Magistrate Judge David T. Bristow

PLAINTIFF'S PROPOSED VOIR DIRE

TO THE HONORABLE COURT, AND ALL PARTIES THROUGH THEIR ATTORNEYS OF RECORD:

Plaintiff hereby submits his Proposed Voir Dire.

DATED: December 23, 2025

LAW OFFICES OF DALE K. GALIPO

By: s/ Renee V. Masongsong
Dale K. Galipo
Renee V. Masongsong
Attorneys for Plaintiff

1 **PLAINTIFF'S PROPOSED VOIR DIRE QUESTIONS**

2 Plaintiff respectfully requests the Court to ask the jury panel the following
3 [Proposed] Voir Dire questions as set forth below.

4

5 **A. Questions re: Peace Officer Bias**

- 6 1. Would you be more likely to believe a police officer's testimony over the
7 testimony of a non-police officer?
- 8 2. Do you think a police officer who is a defendant in a civil case is capable of
9 testifying falsely under oath?
- 10 3. Are you a current or former government employee or police officer?
11 a. If yes, what agency and what type of job?
- 12 4. Are any of your family members or close friends a current or former
13 government employee or police officer?
14 a. If yes, what agency and what type of job?
- 15 5. Have you applied to or are you a member of any branch of the armed forces?
- 16 6. Are you or any of your family members or close friends current or former
17 service members in any division or branch of our military? If yes, what
18 division or branch and what type of job?
- 19 7. Have you or has anyone you know attended or applied to attend any law
20 enforcement academy or basic training?
- 21 8. Have you or anyone you know worked as or applied to work as a firefighter,
22 paramedic, or other type of emergency response personnel?
- 23 9. Have you ever been a victim of a crime?
24 a. What was the crime?
25 b. Did you have a positive or negative impression of law enforcement as a
26 result?
27 c. In light of that experience, could you still be fair to both sides?

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- 1 10. Have any of your close family members or friends been a victim of a crime?
- 2 a. What was the crime?
- 3 b. Did you have a positive or negative impression of law enforcement as a
- 4 result?
- 5 c. In light of that experience, could you still be fair to both sides?
- 6 11. Does anyone feel that police officers have been unfairly portrayed in the
- 7 media with respect to the use of force? In what way?
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9 **B. Questions re: Juror Connection to Defendants**

- 10 1. Have you, a family member, or any of your close friends had any contact or
- 11 association with the San Bernardino Sheriff's Department, or any of their
- 12 employees? If so, please describe the circumstances of the contact or
- 13 association.
- 14 a) If so, would you view the evidence in this case differently
- 15 because of your past experience with the San Bernardino
- 16 Sheriff's Department, or any of their employees?
- 17 2. Are you or is anyone you know a current or former employee of the San
- 18 Bernardino Sheriff's Department? If so:
- 19 a) Who do you know?
- 20 b) What is or was their job?
- 21 c) How long were they employed?
- 22 d) Would you view the evidence in this case differently because of
- 23 your past experience with the San Bernardino Sheriff's
- 24 Department, or any of their employees?
- 25

26 **C. Questions re: Justiciability of Peace Officer Conduct**

- 27 1. Do you agree or disagree that society should hold police officers liable in
- 28 court when they violate an individual's constitutional rights?

- 1 2. Do you agree or disagree that police officers or the entity they work for
- 2 should pay money damages when they violate an individual's constitutional
- 3 rights?
- 4 3. Do you agree or disagree that police officers should be able to use as much
- 5 force as they want when arresting someone?
- 6 4. Do you agree or disagree that our society should restrict the amount of force
- 7 that police officers can use?

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9 **D. Questions re Drug Bias**

10 Plaintiff requests that this Court voir dire the jury on drug bias only in the
11 event that the Court denies Plaintiff's Motion *in limine* to exclude evidence of Mr.
12 Barber's drug use.

- 13 1. Do you know anyone who has used or been accused of using drugs?
- 14 2. Do you know anyone who has used methamphetamines?
- 15 3. Do you have any feelings, thoughts, or preconceptions about people who use
16 drugs?
- 17 4. Do you think it would be difficult to be fair to both sides if you heard
18 evidence that one of the parties had used drugs?
- 19 5. Do you have any particular knowledge or information regarding the effects of
20 methamphetamine on a person?
- 21 6. If you heard evidence that one of the parties had used drugs, do you think that
22 you could still find that Deputy Alfred's conduct was unreasonable?
- 23 7. If this Court instructs you that people have the right to be free from
24 unreasonable detentions and excessive force by police officers, do you have
25 any feelings, one way or another, about whether a person who uses drugs
26 deserves the same protection from unreasonable detentions and excessive
27 force by police officers as everyone else?

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- 1 8. Do you have any feelings, one way or another, about whether a person who
- 2 uses drugs has the same right to bring a claim in court for violations of their
- 3 rights as does everyone else?
- 4 9. Could you put aside whatever knowledge, information, or preconceptions you
- 5 may have about drugs and listen to the evidence?

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7 **E. Questions re Bias Against Criminal History**

8 Plaintiff requests that this Court voir dire the jury on bias against criminal

9 history only in the event that the Court denies Plaintiff's motion *in limine* to exclude

10 evidence of Mr. Barber's criminal history.

- 11 1. Do you know anyone who has ever been arrested or convicted of a crime?
- 12 2. Do you have any feelings, thoughts, or preconceptions about people who have
- 13 been arrested or convicted of a crime?
- 14 3. Do you think it would be difficult to be fair to both sides if you heard
- 15 evidence that one of the parties had been arrested or convicted of a crime in
- 16 the past?
- 17 4. If you heard evidence that one of the parties had been arrested or convicted of
- 18 a crime in the past, do you think that you could still find that Deputy Alfred's
- 19 conduct was unreasonable?
- 20 5. If this Court instructs you that people have the right to be free from
- 21 unreasonable detentions and excessive force by police officers, do you have
- 22 any feelings, one way or another, about whether a person who had been
- 23 arrested or convicted of a crime in the past deserves the same protection from
- 24 unreasonable detentions, restraint, and excessive force by police officers as
- 25 everyone else?
- 26 6. Do you have any feelings, one way or another, about whether a person who
- 27 had been arrested or convicted of a crime has the same right to bring a claim
- 28 in court for violations of his rights as does everyone else?

1 7. Could you put aside whatever knowledge, information, or preconceptions you
2 may have about individuals with a criminal history and listen to the evidence?
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